

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOHN DOE,
Plaintiff,

V.

UNIVERSITY OF TEXAS HEALTH
SCIENCE CENTER AT HOUSTON,
UNIVERSITY OF TEXAS BOARD OF
REGENTS, MARGARET MCNEESE, in her
individual and official capacity, DEANA
MOYLAN, in her individual and official
capacity, SHEELA LAHOTI, in her individual
and official capacity, and DANA
MCDOWELLE, in her individual and official
capacity,
Defendants.

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Civil Action No. 4:21-cv-01439

JOINT MOTION FOR PROTECTIVE ORDER

NOW COME Plaintiff, John Doe, and Defendants, The University of Texas Health Science Center at Houston (UTHealth), Margaret McNeese, M.D., Deana Moylan, Sheela Lahoti, M.D., and Dana McDowelle, M.D., in both their individual and official capacities (the Administrators) (collectively, the Parties), and file this Joint Motion for Protective Order concerning the production and use of confidential information in this case.

Parties have agreed to the Agreed Confidentiality and Protective Order attached. The proposed order is intended to provide protection relating to confidential information, documents, and materials containing same.

Respectfully submitted.

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of October 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically provided notice to all counsel of record.

/s/ Cory A. Scanlon
CORY A. SCANLON
Assistant Attorney General